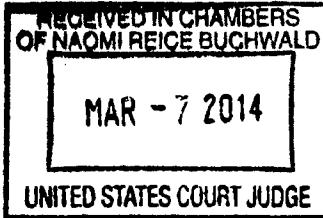


**GIBSON DUNN  
MEMO ENDORSED**

March 7, 2014

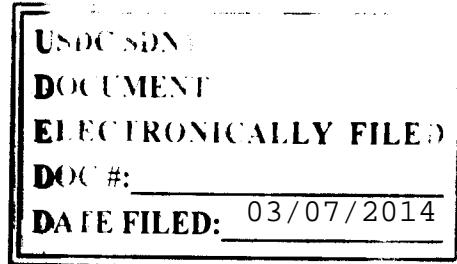
VIA FACSIMILE

Hon. Naomi Reice Buchwald  
United States District Court  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312



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Re: *United States Securities and Exchange Commission v. China Northeast Petroleum Holdings Ltd., et al.*, No. 12-CV-8696-NRB

Dear Judge Buchwald:

On behalf of Defendant Chao Jiang in the above-referenced action, we write to inform the Court of an impending scheduling conflict between the matter before Your Honor and the pending parallel criminal proceedings before Judge Leon in the U.S. District Court for the District of Columbia.<sup>1</sup>

In a pre-trial conference on March 6, 2014, Judge Leon informed the parties that he would be holding a second pre-trial hearing on March 12, 2014, to have argument on several pretrial motions. This date conflicts with the oral argument already scheduled before this Court on the pending Motion to Dismiss, filed by Mr. Jiang on April 12, 2013, for 11:30 on March 12.

Mr. Jiang respectfully requests that the Court permit a one-day delay of the hearing on the Motion to Dismiss to the morning of March 13.<sup>2</sup> We have confirmed that counsel for Hongjun Wang will also be available at that time.

Mr. Jiang's trial counsel for the parallel civil and criminal cases are the same attorneys. Mr. Jiang would also very much appreciate the opportunity to attend both hearings in person. A one-day delay would allow for this to happen.

*Application denied.*  
*Naomi Reice*  
*Dechurled,*  
*USDC*

3/7/14

<sup>1</sup> *United States v. Wang, et al.*, No. 1:13-cr-00152 (D.D.C.) (Leon, J.).

<sup>2</sup> Judge Leon is away beginning March 13 until just before jury selection in the criminal proceedings.

GIBSON DUNN

Honorable Naomi Reice Buchwald  
March 7, 2014  
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Respectfully Submitted,

/s/Thad A. Davis  
Thad A. Davis

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Joseph A. Akrotirianakis  
Michael J. Coffino  
Jamie Santos